

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WALKER DIGITAL, LLC,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 11-00368-GMS
)	
CAPCOM ENTERTAINMENT, INC.,)	JURY TRIAL DEMANDED
CAPCOM U.S.A., INC., ELECTRONIC)	
ARTS, INC., KONAMI DIGITAL)	
ENTERTAINMENT, INC., MICROSOFT)	
CORPORATION, SEGA OF AMERICA,)	
INC., SONY COMPUTER)	
ENTERTAINMENT AMERICA LLC,)	
SQUARE ENIX OF AMERICA HOLDINGS,)	
INC., SQUARE ENIX, INC., THQ INC., and)	
UBISOFT, INC.,)	
)	
Defendants.)	

RESPONSE TO NOTICE OF RELATED MATTER

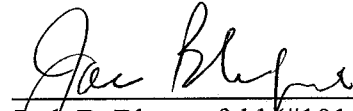
Defendants Capcom Entertainment, Inc., Capcom U.S.A., Inc., Electronic Arts, Inc., Konami Digital Entertainment, Inc., Sega of America, Inc., Sony Computer Entertainment America LLC, Square Enix of America Holdings, Inc., Square Enix, Inc., THQ, Inc. and Ubisoft, Inc. (together, the "Objecting Defendants") hereby respond to the Notice of Related Matter (the "Notice") filed by Microsoft Corporation in *Walker Digital LLC v. Google Inc. et al.*, C.A. No. 11-369-GMS (D.I. 46), to which the Objecting Defendants are not parties.¹

The Objecting Defendants respectfully disagree with Microsoft's suggestion that the cases identified in its Notice are related to, or should be coordinated or consolidated with, this action. The cases identified by Microsoft involve different patents and different accused technologies than those at issue here. Further, the Objecting Defendants are not parties in the

¹ A copy of Microsoft's Notice in Case No. 11-369-GMS is attached for the Court's convenience.

cases listed by Microsoft. Accordingly, the Objecting Defendants believe that requiring them to coordinate with unrelated defendants in cases involving different patents and different accused technologies would impose an undue burden on these defendants without any benefit to the Court or the litigants.²

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September 7, 2011

² Microsoft has not expressly requested coordination or consolidation in its Notice of Related Actions. To the extent that Microsoft intends to seek coordination or consolidation in the future, the Objecting Defendants would oppose any coordination or consolidation for the reasons explained in this Response.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WALKER DIGITAL, LLC,

Plaintiff,

v.

GOOGLE INC., et al.,

Defendants.

C.A. No. 11-CV-00369-GMS

NOTICE OF RELATED MATTER

PLEASE TAKE NOTICE, pursuant to Local Rules 3.1(b)(2) and (b)(4), Microsoft Corporation, hereby identifies *Walker Digital, LLC v. Google Inc., et al.*, C.A. 11-cv-00311-PSD, as a related case, as it involves four of the same parties. In addition, internet advertising related-services are involved in both cases, and the Microsoft services accused in the respective complaints appear to be overlapping. A notice of related case was filed in *Walker Digital, LLC v. Google Inc., et al.*, C.A. No. 11-cv-311-PSD, to indicate that it was related to the above-captioned matter.

Pursuant to Local Rule 3.1(b)(4), please take notice that *Walker Digital LLC v. Microsoft Corp., et al.*, C.A. 11-cv-00368-GMS and *Walker Digital LLC v. Microsoft Corp., et al.*, C.A. 11-cv-696, also involve parties overlapping with those in the above-captioned matter.

Dated: August 25, 2011

FISH & RICHARDSON P.C.

By: /s/ Tara D. Elliott

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CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to:

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Tara D. Elliott, Esquire
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I further certify that I caused copies of the foregoing document to be served on September 7, 2011, upon the following in the manner indicated:

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